

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 04-30034-MAP  
 )  
 MICHAEL CROOKER, )  
 Defendant. )

Government's Opposition to Fourth Speedy Trial Motion

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, submits this memorandum in opposition to Michael Crooker's latest speedy trial motion.

Mr. Crooker's motion does not raise any new issues. In prior memoranda, the government has detailed the speedy trial exclusions entered by the Court and the pending motions that have tolled the running of the speedy trial clock.

Mr. Crooker's argument boils down to his frequently repeated allegation that the government failed to provide timely discovery. As explained to the Court previously, from the outset of this case the government has invited the defense to inspect the evidence. When the defense has asked to inspect the evidence the government has made it available, including arranging to have Mr. Crooker inspect evidence in the U.S. Attorney's Office. It will continue to do so. There has been neither government misconduct nor prejudice to Mr. Crooker.

Conclusion

For the foregoing reasons, Mr. Crooker's motion should be denied.

Respectfully submitted,  
MICHAEL J. SULLIVAN  
United States Attorney

by: /s/ Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney

Date: June 20, 2006

Certificate of Service

June 20, 2006

I certify that I caused the foregoing document to be electronically delivered to counsel for the defendant, Vincent Bongiorno, Esq, 95 State Street, Springfield, MA 01103.

/s/ Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney